UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6307CR-DIMITROULEAS

UNITED STATES OF AMERICA, Plaintiff.

VS.

VALERIE ENRIQUE and AIRBAGS EXPRESS, INC. Defendant(s).



MOTION FOR CONTINUANCE

COMES NOW the Defendants Valerie Enrique and Airbags Express, Inc., through counsel undersigned and makes this Motion for Continuance and as grounds would state the following:

- 1. This matter is scheduled for Sentencing on March 30, 2001.
- 2. The undersigned has a Florida Bar trial scheduled before Judge Lupo in West Palm Beach in The Florida Bar v. Alexander Siegal, Florida Bar Case Number 98-51,179(17b).
- 3. The undersigned is currently involved in a six Co-Defendant RICO trial, State v. Karim Ghanem, et al, Case Number 96-19226CF, before Judge Horowitz which will continue for approximately six more weeks.
- 4. Foreseeing the above, Judge Lupo scheduled the Florida Bar trial far in advance in order to avoid the above trial conflict.
- 5. Tom Watts-Fitzgerald, Assistant United States Attorney, has indicated that he has no objection to the granting of this Motion. Both counsel have coordinated their schedules and both are available the following Friday, April 6, 2001 if that date and time is convenient to the Court.

WHEREFORE the Defendant requests this Motion be granted.



cr-06307-WPD

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to Thomas Watts-Fitzgerald, Esq., Office of the United States Attorney, 99 N.E. 4th Street, Miami, Florida 33132, this 2 day of January, 2001.

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